

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

RAYAN BROOKE WOLF

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 661, 1163, and
1153

COUNT ONE

Theft in Indian Country

The Grand Jury Charges:

Between on or about July 1, 2016, and on or about October 1, 2016, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

RAYAN BROOKE WOLF,

an Indian, while engaged in a continuing course of conduct, did take and carry away, with intent to steal and purloin, moneys belonging to another, namely, the Gerald “Tex” Fox Justice Center, an Indian tribal organization, of an aggregate value in excess of \$1,000;

In violation of Title 18, United States Code, Sections 661 and 1153.

COUNT TWO

Theft from an Indian Tribal Organization

The Grand Jury Further Charges:

Between on or about September 1, 2016, and on or about January 1, 2017, in the District of North Dakota,

RAYAN BROOKE WOLF,

while engaged in a continuing course of conduct, did steal and knowingly and willfully convert to her own use, moneys, funds, credits, goods, assets, and other property belonging to the Gerald “Tex” Fox Justice Center, an Indian tribal organization, of an aggregate value in excess of \$1,000, namely, purchasing items with the Gerald “Tex” Fox Justice Center’s charge account at Jason’s Super Foods located in New Town, North Dakota, with the intention of wrongfully keeping the Tribal Organization’s moneys, funds, credits, goods, assets, and other property;

In violation of Title 18, United States Code, Section 1163.

COUNT THREE

Theft from an Indian Tribal Organization

The Grand Jury Further Charges:

Between on or about July 1, 2016, and on or about January 1, 2017, in the District of North Dakota,

RAYAN BROOKE WOLF,

while engaged in a continuing course of conduct, did steal and knowingly and willfully convert to her own use, moneys, funds, credits, goods, assets, and other property belonging to the Gerald “Tex” Fox Justice Center, an Indian tribal organization, namely, by purchasing gasoline with the Gerald “Tex” Fox Justice Center’s United Quality Cooperative charge account, with the intent of wrongfully keeping the tribal organization’s moneys, funds, credits, goods, assets, and other property;

In violation of Title 18, United States Code, Section 1163.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

JJO/am